Supreme Court, U.S.
FILED
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CLERK

No. 95-914

In The
SUPREME COURT OF THE UNITED STATES

October Term, 1995

EDITH HOROWITZ BROIDA,

Petitioner,

v.

ESTATE OF MAURICE HOROWITZ, Deceased, Through Its Personal Representative, Samuel S. Smith, et al,

Respondents,

On Petition for Writ of Certiorai to the United States Eleventh Circuit Court of Appeals

PETITIONER'S REPLY BRIEF AND APPENDIX

EDITH BROIDA
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420 So.2d 936.

THE RULING OF THE DISTRICT COURT DISMISSING PETITIONER'S CAUSE DUE TO LACK OF DIVERSITY OF CITIZENSHIP BETWEEN PLAINTIFF AND DEFENDANTS WAS CLEARLY ERRONEOUS REJECTING EVIDENTIARY PROOF OF ESTABLISHED DOMICILE OF PLAINTIFF

Respondent Smith's arguments highlight why this Court should grant the Petition.

The ruling of the District Court and affirmance by the appeal Court of the rejection by the Magistrate of the incontrovertible written evidence filed by Plaintiff proving a physical residence in Washington, D. C. continuously without one day's discontinuance since 1963 and continuing to the present, coupled with her declaration of it as her legal domicile as opposed to her temporary residence in Florida necessitated for the purpose of protecting her inheritance property rights, and working as personal representative and attorney in two estates of her deceased parents to protect her legal rights of her interest in those estates and the interest of her brother and other family members rights as delineated by heirship settlement contracts held inviolate by Florida probate law WAS CLEARLY ERRONEOUS. See RApp,p 1 Affidavit of Edith and Alvin, p 2 Affidavit of Paula Horowitz Roth.

This Court agreed to review the facts in the case of the forefeiture by the state, upheld by the State Supreme Court, of the personal property owned by Tina Bennis, just as it should herein.

The Magistrate's Recommendation is a hodge-podge of misstatements of the written evidence going into great detail

about plaintiff's membership in private organizations in Washington and Miami,and naming organizations from a brochure plaintiff had used in a political campaign against the probate judge whose term ended in 1986 and was the one who invalidly interfering in the Maurice Estate made the appointments invalidly of Smith and Kelner when the estate probate was assigned to him five years after it had begun, was completely settled, and plaintiff had litigated removing six invalid claimants, increased the value of the property under eminent domain proceedings,from $100,000 offered by the condemnor to $300,000 jury verdict. The 1981 jury verdict was appealed by Plaintiff for the errors of the trial judge, and the appeal court entered its reversal in 1982. See RApp, p 7 ,or 420 So2d 936, Estate Maurice Horowitz, Broida and Alvin Horowitz, Personal Representatives v. City of Miami Beach. The reversal remanded the case for new trial and the expert appraiser's valuation of betweeen $648,000 and $1,000,000, worried the condemnor..

The invalid appointments and negotiation of Smith to take over the new trial caused Broida and Alvin to settle, to keep the marauding judge and lawyers from taking total control of that case as well which Broida had litigated for five years for her parents and six for the estate. She had argued the appeal herself but now had no desire to keep working for the benefit of the marauding new lawyers. They settled for another $100,000 above the jury verdict.

Since that probate judge came up for reelection and Broida had legal domicile as declared by her in Miami Beach she would not permit him to go un-

challenged. The judge was beloved by lawyers for awarding big fees from the money in estates over which he presided. Plaintiff financed the campaign with her own money and included in her brochure, as is usual,organizations to which she belonged in her life- beginning in 1943 plus her educational history and accomplishments: American Jewish Congress,1947 but no longer; The Florida Association of Women Lawyers, not since the 50's; on various visits to Miami, after moving to Washington she made appearances at various organization hearings and delivered her opinions, and was made a member, in the 70's.

Plaintiff has been an activist since becoming an adult, and did the same on moving to Washington, and would be so involved anyplace she would be living.

A year after the campaign, in which she received about 48,000 votes, and invested $12,500 as opposed to the 14 year incumbent expenditure of $126,000 she changed her domicile from Miami to her existing physical domicile in Washington, D. C., in 1987.

If a person joins an organization based in California while domiciled in New York does that change his domicile to California?

The Magistrate complains that Plaintiff refused to give her address in either Miami or Washington, uses a Post Office Box in Miami, uses an answering telephone service in Miami. When Plaintiff filed a motion that she would give her Washington address to the Magistrate under confidential seal because the defendants are her enemies and she does not want them to have it, asking for court protection, he denied the motion. It is the Court that needs to be convinced, and Court's have the discretion to provide protection to litigants and witnesses when the information could endanger them. See RApp, p 7 Plaintiff's Motion.

With the information that Plaintiff moved to Washington in 1963 and has maintained a residence there continuously but holding the home of her parents as her domicile although she no longer lived there., with the information that she was employed in Washington for federal agencies, filed her income tax returns in the Philadelphia office which covers Washington, and that she only returned on visits to Miami on an as-needed basis by her parents, the magistrate had no difficulty in finding that she had a legal domicile in Miami where she did not have a permanent residence. See RApp, Plaintiff's Letter to Internal Revenue Service, Philadelphia, Pa, on refund on 1984 Tax Return filed with them., dated 1988., p **6** .

He refused to recognize that she filed title to her car purchased in Miami with District of Columbia, but then had to register it in Florida with Florida tags to avoid double taxation and Florida transient taxes of $400and that the car is insured as from her main residence in Washington by the Virginia office of the national insurance company. See Letter to D. C. Dept. Transportation seeking copy of title, dated 1987, RApp, p **5** .

The Magistrate also could not understand why she disconnected her telephone service in Washington and payment for it, which she did because she was not there to use it, and not until after many years had passed keeping her in Miami for the litigation. She could afford to save some money when she had to maintain two residences because of the estate litigation.

The litigation against the attorney who prepared the invalid will ended,plaintiff had only the eminent domain suit to finalize until the probate judge's interference deciding to take control of the estate caused all

litigation to begin again to remove the invalid appointments and retake the estate.

Smith warned Plaintiff that if she tried to remove him the more it would cost the estate. It was impossible to stop him, because after Smith attached himself to the probate court, although spending most of his time attending Bar conferences around the world, developing a relationship with judges,he was so well known to them that the invalid actions could not be reversed.

While Plaintiff had successfully revered the eminent domain verdict on appeal before Smith entered the estate, from then on she could not win, which the probate judge, who appointed him continuously planned, and succeeded.

When the issue of domicile is raised it becomes evidentiary. Therefore Smith's objection to the pleadings presenting written evidence to the Court as she was able to locate it, and having to return to Washington to her home there to obtain some of it is objectionable. Smith, although formerly personal representative of the Estate did not attend the two hearings held by the magistrate. He was probably off to a Bar convention. After his petition came up for fees before the probate judge, he left the final hearings to go off to a Bar convention, and was not present, and of course never did anything to carry out his fiduciary duties to protect the assets of the estate. He would not object to the invalid $25,000 fees to attorney Rosen or the $10,000 to attorney guardian Milton Kelner, who after all were there supporting him and the probate judge.

Smith complains also of all the history presented by Petitioner to this Court.

This presentation of the facts as to Plaintiff's domiciliary life, her relationships with her parents and other members of the family, her reasons for moving to Washington, the necessity for her to return from the new home she chose in 1963 to serve the needs of her parents living in her former domicile, the reasons for claiming their home as her domicile to be able to return to serve them, the necessity for her prolonged stay in her former domicile due to the estate litigation, and her final withdrawal from the former domicile by withdrawing her voting rights and making a public declaration to the defendants that her residential location in Washington is her domicile from December 1987, and why there is even such necessity for a lawsuit in federal court- are all necessary to prove her domicile in Washington.**RApp,p**12,13,14

Or perhaps he and the Magistrate expect that she should have left Florida and returned to Washington to stand in front of her residence and shout " This is now my legal domicile", or advertise the statement in the newspapers or on television. But then they wouldn't know about it!

Smith uses his Reply to defame Plaintiff's reputation by citing her suspension by The Florida Bar. He states that she should not have been involved in protecting her legal rights by taking appeals and disqualifying obviously prejudiced judges. He does not advise the Court that the charges were brought by a lawyer representing him in a suit filed by Petitioner against him and his brother for their interference in the Estate.

These charges were spurious regarding whether Broida had an ex parte discussion with a judge on the return of the case against Smith to Dade County court where a presiding

judge had granted her motion to transfer it to a different county. The judge before whom it came, claiming he knows Smith very well transferred it back, but his action was appealed by Broida.

The charges against her were ridiculous and came before a committee of young lawyers who were friends of the young lawyer representing Smith. Grievance officers of the Florida Bar are recent law school graduates with no experience as lawyers hired by the executive director. This grievance officer approached Petitioner to settle before the case went to a Judge, but Petitioner refused to even discuss it with him because the charges were so ridiculous.

The suspension ended a year later, but Petitioner will never rejoin the Florida Bar although she continued to pay dues all the years she has been living in Washington while not in Florida using her license to practice law, and would like the dues returned.

The Judge hearing the charges was about to retire and go live in Colorado. He had an attention span of two minutes. He was known as one of the worst judges in Broward County always finding a defendant guilty since he sat on criminal cases.

Not only did Smith want to take her money and her work he also wanted to destroy her sterling reputation of a lifetime, which is:

Broida was presented with seven honor scrolls at elementary school graduation ceremony on stage: she skipped three times and was captain of her gym class from age 9 through high school; her senior year in high school was in Miami Beach and she made all A's graduating with honors; and majoring in the field of education and sociology in college graduating with honors; began work in her parent's retail business at age 16, as bookkeeper and all other positions

after college she worked in her parent's business; in the 40's, then married, she formed a women's auxiliary for the Men's Junior Chamber of Commerce, became active in local, state, and national political campaigns seeking the best candidate; raised funds for both Jewish and Christian charitable organizations as well as the March of Dimes; and other medical needs;

began efforts against ethnic and racial discrimination, first, to remove the anti-semitic signs on apartment and hotel dwellings in Miami Beach, and for civil rights of black minorities working with the Urban League; joined the American Jewish Congress in 1947 and elected as Vice-President after four months of coordinating fund raising events; had to give up daytime organization activities entering law school at night and working in the day, as assistant administrator for Temple Emanuel day school; later as advertising director of a promotional magazine, and other jobs as they suited her time as a law student and mother rearing a child.

was chosen by KBP sorority as having the highest average of women students in the law school and awarded a book scholarship and plaque at a luncheon with presentation by the Dean; invited to join the Law Review, and was elected Case-Note Editor by the other members; was an editor on the Law magazine and the Yearbook, and authored an article published in Miami Law Review, 1955, on Municipal Corporations Law.

graduated fifth in a class of 103, cum laude. Opened an office for the practice of law, engaged in litigation and won at least 95% of her cases until moving to Washington. See RApp, p 8 Letter from Floyd A.Wright, law school professor on her application for a scholarhsip to study International Law.

After law school Petitioner continued to be engaged in civil rights activities working with the ACLU, and also for the Girls Scouts of America as public relations director; directed 3 Bar conventions.

In Washington Petitioner deliberately worked as a youth specialist,first, coordinating the first federal 'Upward Bound' program for the D. C. Model School Division recruiting disadvantaged students from the four D. C. High Schools; then for the Department of Labor's 'Cause' program-recruiting college graduates to be trained for all state employment offices as one-stop youth counselors; was on the first Job Corps committee; a program manpower specialist for grants to organizations giving basic education and employment training to school dropouts, and also retraining displaced older workers, and directing selection of college graduate applicants for the first National Teacher Corpsfor the Office of Education. RApp,p10

Samuel Smith lacks legal ethics and integrity. Plaintiff was referred to him for the litigation against the Shapiro invalid will. She conferred with him to represent her and her brother and the family against the Will. He offered to settle it which Broida and Alvin would not accept at that time. They didn't retain him. Having fully discussed the case with him, when he was appointed five years later into the case as an antagonist (he was in Germany) and confronting him as he went into see the Judge on his return reminding him that by Florida legal ethics he could not come in as an antagonist now. He went in for an ex parte discussion about it with the judge and accepted. From that day forward he has reviled, ridiculed and demeaned Broida treating her as though she owes him a living while taking her work, her life, and her money.

Smith was brought into his older attorney brother Harry Smith's firm, Smith & Mandler.

Broida learned of a merger of Harry Smith with the Ruden firm, raising it at a hearing. The small estate with initial assets of $5400 and an interest in real estate for which $100,000 had been offered was too small for a large firm like Ruden. From the transcript this is the response of Sam Smith.

"For whatever relevance there is to this hearing, so the record is straight, my firm has not merged with the Ruden firm, notwithstanding Mrs. Broida's belief of what she reads in the newspapers. Although she has sued them for merging with us, we have not.

Mrs. Broida: Your Honor, may I ask for a very definite statement that they are not going to merge, because - - -

Mr. Smith: We might well merge,and if my grandmother had wheels, Mrs. Broida, she'd be a wagon."

This was typical Smith throughout all proceedings-the man appointed as a fiduciary to protect estate assets. Harry Smith in a few weeks join Ruden as a partner bringing brother Sam with him. Harry specializes in real estate.

The District Judge Having Two Cases With The Same Diversity Issue Set One For Trial Twice While This Awaited The Magistrate's Report When He Should Have Heard The Issue Himself And Erroneously Did Not Review The Report De Novo And Hold Hearing Making It Evident He Was Totally Unfamiliar With Both Cases

The district judge must be reversed since he accepted the Report not knowing what either case entailed, and the appeal court as well.

CONCLUSION

For the reasons given in the Petition and Reply the Petition should be granted.

Respectfully submitted,

Edith Broida, Pro Se
P. O. Box 5941
Tel:301-681-2050 Washington, D. C. 20016

IN THE CIRCUIT COURT OF THE
11th JUDICIAL CIRCUIT IN AND
FOR DADE COUNTY, FLORIDA

PROBATE DIVISION
Case No. 78-1553
Division 02 (Judge Blanton)

Filed June 21, 1979
Clerk, Dade County
Probate Division

In re: ESTATE OF
MAURICE HOROWITZ,
Deceased.

AFFIDAVIT

State of Florida)
County of Dade) SS:

BEFORE ME, the undersigned authority, a duly authorized Notary Public of the State of Florida, personally appeared affiants, who being duly sworn upon oath, make this Affidavit; they depose and state:

That they are Edith Horowitz Broida and Alvin Edward Horowitz respectively and are the only two children of decedent Maurice Horowitz (Moe) and his spouse Anne Gottlieb Horowitz deceased seven months prior to decedent herein, and they are both respondent-petitioners in the within cause.

That Edith Horowitz Broida is the older of the two children and has a long-term relationship with decedent herein and his spouse as their attorney, tax preparer, companion, and is attorney for the estate of his spouse also before this Court, and that she is the person most familiar with all the circumstances of both estates of both decedents giving her special knowledge of this cause.

That by agreement she represents all the respondent-petitioners being herself, the other adult child, and his four children who are grandchildren

of decedent and his spouse, as attorney in this case.

Said affiants for themselves and the other four respondent-petitioners claim that her represntation and her testimony are essential to their cause and they would suffer a substntial hardship were she to be precluded from serving as attorney and testifying as a party if and when necessary.

FURTHER Affiants Saith Not.

s/s Edith Horowitz Broida
EDITH HOROWITZ BROIDA

s/s Alvin Edward Horowitz
ALVIN EDWARD HOROWITZ

I hereby certify that on this day, the affiants above described executed the foregoing instrument before me, and acknowledged that they executed the same freely and voluntarily for the purpose therein stated. Witness my hand and official seal at Miami, Dade County, Florida , this 21st day of June, 1979.

s/s Belinda Erst
Notary Public, State of Florida

My Commission Expires Oct 10, 1987

IN RE: ESTATE OF Maurice HOROWITZ, DECEASED.	IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT IN AND FOR DADE COUNTY, FLORIDA PROBATE DIVISION CASE NO. 78-1553 Div. 04 Newbold

AFFIDAVIT

State of Florida)
County of Dade) SS:

Filed
8/26/83
Clerk
Probate Div.

There is no necessity for this Affidavit, however, in order to resolve any question, I, Paula Horowitz Roth, daughter and second issue of Alvin Edward Horowitz, thirty-six years of age, employed as an executive office manager, a resident of Dade

County, Florida, do hereby:

Reaffirm that Agreement dated April 3, 1978 and which is filed in this cause, into which I entered and consider binding upon me, my brother Stephen Ronald Horowitz, my sisters Karen H. Barnett, Betsy Jo Horowitz and my father Alvin Edward Horowitz, and my aunt Edith Horowitz Broida by which Agreement I am my brother and sisters assigned all our right, title and interest in the Estate of our grandfather Maurice Horowitz, equally to our father Alvin Edward Horowitz and Aunt Edith Horowitz Broida who are brother and sister and the only two children of our grandparents, in accordance with the terms of that Agreement, and further

I reaffirm the Waiver and Consent of 1978 and all other instruments which I signed on their behalf in this Estate.

Having sworn to this Affidavit before the undersigned authority, further I saith not.

Witnesseth:
s/s Jacqueline Uganiya
Address:
Faith C. Madison
Address

s/s Paula Horowitz Roth
Paula Horowitz Roth
7803 N.W. 22 Street
Miami, Fla.

On August 12, 1983 before me, the undersigned, a Notary Public in and for the State of Florida personally appeared before me Paula Horowitz Roth known to me to be the person whose name is subscribed to the within instrument and executed same before me. Witness my hand and official seal, this day.

S/s(Illegible)

My Commission Expires

EDITH HOROWITZ BROIDA, AND AS EDITH BROIDA,
Plaintiff,
vs.
Estate of Maurice Horowitz through Samuel S. Smith as personal representative, and other defendants.
Defendants.

United States District Court Southern District of Florida

Case no. 92-997 Atkins

PLAINTIFF's MOTION FOR COURT TO PERMIT PLAINTIFF TO FILE WITH THE COURT EVIDENCE OF HER PHYSICAL ADDRESS IN WASHINGTON, D. C. UNDER CONFIDENTIAL SEAL FOR THE COURT'S INFORMATION ALONE IN SUPPORT OF DIVERSITY EVIDENCE

Plaintiff Edith Horowitz Broida makes this Motion that she be permitted to file with the Court under confidential seal her permanent address in Washington, D. C. and the length of time she has lived at that address and paid the cost of living at that address maintaining it for her return to Washingtion after the conclusion of the litigation which has kept her in Miami since 1977.

At hearing on April 6th, yesterday Plaintiff explained to the Court that she has not divulged the address because all the defendants are not just adversaries, but'enemies' of hers and she needs to protect her safety.

The insurance company that has been insuring her residence in Washington D. C. since 1976 has presented a statement to that effect. Their office is in adjacent Northern Virginia. They have also stated that they insure her car (since her major residence is in Washington, D. C. Plaintiff has also filed with the Court the information that she registers her car in Florida since she uses it mainly in Florida, due to the necessity for her to be here because Florida charges $395 for all out-of-state cars used in Florida every year, and when in

1978 plaintiff bought a car in Florida and paid sales tax, upon registering it in Washington she had to again pay an excise tax for having brought it into Washington. She then registered her car in Florida when that State passed the law requiring payment of $100 fee for cars with out-of-state licenses used in Florida, now increased.

Wherefore, if the issue concerning this Court is the physical address of the home of plaintiff as evidence of her domicile in Washington, D. C. plaintiff will provide that information solely to Magistrate Bandstra as confidential sealed evidence not to be viewed by any of his staff or anyone else.
Attachment: Miami Herald article on new law increasing fee on out-of-state cars.

s/s Edith Broida

May 27, 1987

P. O. Box 390751
Miami Beach, Fla.

D. C. Department of Transportation
Bureau of Motor Vehicles Services
East Administration Building
301 C Street N. W.
Washington, D. C. 20001

Dear Department:
I have registered the title of my car in Florida because they require it when a car is driven there.

I have not changed my title from District of Columbia.

If they have stupidly sent you my title that you just sent me do not cancel my registration of title in District of Columbia.

If I change anything I will remove it from Florida, if there is a problem.

I'd like you to send me a Title that shows when that car was titled in D. C. and it was in 1978 around August or September. The title you sent has a new date. Send me a duplicate of the original. Thank you.

Edith E. Broida

Department of the Treasury
Internal Revenue Service
Philadelphia, Pa. 19255

In reply refer to:
28600646
Oct. 24, 1988
LTR 206C

EDITH H. BROIDA
P. O. BOX 390751
MIAMI Beach, Fl 33119

Form Number 1040
Tax Period:
Dec. 31, 1984

Dear Edith H. Broida:
Thank you for your inquiry of June 10, 1988 about your refund check. We share your concern and hope the matter will be cleared up soon. The check is being traced. We apologize for the delay. If check has not been cashed or destroyed, you will receive your refund within 90 days from the date of this letter. However if an unauthorized person has cashed the check, a time-consuming investigation may be necessary before a new one can be issued.

Petitioner's Note: Letter from Internal Revenue Service office which handles tax returns for District of Columbia where petitioner filed tax returns.

Excerpts from 420 Southern Reporter, 2d, p 936, Fla, appeal of jury verdict in eminent domain trial on residence of decedent Maurice Horowitz. Appeal taken by Petitioner Broida.

ESTATE OF MAURICE (MOE) HOROWITZ, et al, or Edith H. Broida and Alvin Edward Horowitz as Personal Representatives of Estate of Maurice (Moe) Horowitz, Deceased, Appellants.

v.

CITY OF MIAMI BEACH, A FLorida Municipal corporation, Appellee.

No. 81-1919

District Court of Appeal of Florida, Third District

Oct. 26, 1982

Edith Broida, Miami Beach, in pro per
Norman Malinski and Steven D. Ginsburg, Miami, for appellee.

Before BARKDULL, SCHWARTZ, and JORGENSON, JJ.

PER CURIAM.

In this condemnation case, the property owners contend it was error for the trial court to disqualify their primary real estate appraiser's expert testimony. We agree and reverse.

Florida's constitutional guaranty of full and just compensation in eminent domain actions requires that courts take into account all facts and circumstances which bear reasonable relationship to loss occasioned owner by virtue of his property being taken

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UNIVERSITY OF MIAMI
P. O. Box 8087
Coral Gables, Florida
School of Law February 1, 1958

Dear Edith:

I consider it an honor to write a letter of recommendation in your behalf. I am proud of you as one of our former graduates.

Congratulations and Good Luck!

Cordially,

s/s FAW
Floyd A. Wright
Professor of Corporations Law, and

was Author of the Corporate Code of the State of Oklahoma.

UNIVERSITY OF MIAMI
P. O. Box 8087
Coral Gables, Florida
School of Law February 1,1958

Dr. J. Riis Owre
Dean of the Graduate School
University of Miami
Coral Gables, Florida

Re: Edith E. Broida

Dear Dean Owre:

Edith Broida has advised me that she is making an application for enrollment in the Graduate School of the University to pursue studies leading to a Master's Degree in Law, and this letter is written in her behalf.

I am attaching a list of her educational accomplishments while studying here at the University, and the Latin expression "Res Ipsa Loqutuer" (the thing speaks for itself) seems to be apropros in explaining her qualities. I'm also inclosing a page from the

June 1954, Lawyer of the School of Law magazine.

Edith took two advanced courses from me (Corporations and Corporate Procedure) and in those courses did superb work. She always impressed me as being a brilliantly intellectual, industrious scholar in every sense of the words. Her professional attitude always evidenced a pronounced quality of an analytical, legal mind, so essential in successfully handling intricate problems in law.

Reports which have reached me while she has been engaged in practice during the last four years since her admission to the Florida Bar have been very gratifying. I feel that Edith could qualify for graduate law study in the leading schools of the land. I recommend her as being well qualified in scholastic and every other ability to pursue work on an LL.M. in the Graduate School of the University of Miami.

Sincerely yours,
s/s Floyd A. Wright
Professor of Law

Petitioner's Note. The scholarship requested for graduate study was granted.

CONGRESS OF THE UNITED STATES
House of Representatives
Washington, D. C.
August 3, 1965
(Recd Aug 5,1965)

Mr. Francis Gregory
Assistant Director for Manpower
Department of Labor
1730 M Street, N. W.
Washington, D. C.

Dear Mr. Gregory:

I understand from Paul Cronin in Lowell that the meeting between shoe manufacturers in the Lowell and Lawrence areas and representatives of the Labor Department went extremely well last week.

We are grateful to you for sending Mrs. Edith Broida-- she was an outstanding participant and a credit to the Labor Department.

With every good wish, I am
s/s F. Bradford Morse
Member of Congress

Pet's Note:
Rep. Morse became an Ambassador to the United Nations.

STATE OF VERMONT
Department Of Administration
Montpelier
August 2, 1965

Mrs. Edith Broida, Manpower Administration specialist
United States Department of Labor
Office of Manpower, Automation and Training
1730 M Street, N. W. Room 400
Washington, D. C.

Dear Mrs. Broida:

It was a distinct pleasure to have had an opportunity to meet you last

week and discuss Vermont's application for a project on the state's aging population.

Your grasp of the problem in its broader aspects, as well as your competence as a federal official, were refreshing and encouraging.

The population pattern in Vermont, coupled with a restrictive tax base, comprises a difficult situation in providing all the assistance needed to the older and aging citizens of the state, not only assistance financially but in terms of devoting adequate time and efforts to their special employment and related problems.

All of us who participated in last week's discussion were pleased to find you sympathetic to the problem in all its various aspects and pleased you are handling the project application.

We look forward to your next trip to Vermont.

Sincerely,

s/s William F. Kearns, Jr

William F. Kearns, Jr.
Commissioner

WFK/a

August Weintraub & Co.
Certified Public Accountant
April 10, 1967
Edith Broida
824 New Hampshire Avenue, N. W.
Washington, D. C.
Dear Edith:
Enclosed is a copy of the U. S. Individual Income Tax Return for your parents for 1966. Your father has suggested that we send this to you for review. This return must be filed by April 17, 1967, so please advise us before that date if it meets your approval.

Very truly yours,
s/s Leslie J. August
Certified Public Accountant

April 1, 1967

Mr. Morris Schneider
171 Lincoln Road
Miami Beach, Florida
Dear Mr. Schneider:

My parents have informed me that you called regarding a prospective buyer. Would you please send me the information regarding this.I'm afraid we cannot give you any further financial information than you now have and if the buyer is interested in this business from the truthful information which had already been provided you and from your own knowledge of the long and excellent reputation of this business on Lincoln Road then the next step is for him to come to Miami Beach and speak with the owners and their representatives. We could provide a very nice financial statement to lure them but that would not make the sale after all, would it. What they were buying is a long established and nationally known name and reputation, a location, and a good rental.

May I hear from you by return mail as to the nature of the inquiry and what action you have taken.?

Very truly yours,
s/s Edith Broida

Mrs. Edith Broida
825 New Hampshire Avenue, N. W.
Washington, D. C.

Postmark - May 16, 1973 (Excerpts) Miami

Ann G. Horowitz
1931 Meridian Avenue
Miami Beach, Florida 33139

Tuesday, May 15, 1973

Dear Edith

Hope you are well. Received the change purse. I like it and also the beautiful card you sent. I may frame it.

I gave Alvin the shares.

I said to him I hope I'm not making a mistake, and I still say it. I wanted to give it to him, and as you always said give it now, if you can so that's what I did it was in his name and my name. When I bought it he was very young. But he's all for Marsha and his children. I still don't know if he feels for us,You, Dad, his mother, and Stacie.

I also gave him the balance of Valueline.

Love,
Mother

Envelope addressed: Mrs. Edith E. Broida
Washington, D. C.

WASHINGTON, D. C.
202-333-1356
August 22, 1972

Ms. Evelyn Lester
Patient Account Counselor
Mount Sinai Hospital
4300 Alton Road
Miami Beach, Florida 33140

Re: Maurice Horowitz
admission 317164

Dear Mrs. Lester:
Thank you for your letter of July 21st in reply to mine of July 3rd. You have sent a corrected bill with adjustments to the original. It appears now that the total hospital bill aside from separate fees of anaesthetist, radiologist, surgeon, physician, private nursing is $1706.90. To the original bill of $1662.40 an addition has been made of an unitemized $44.50.

Your charges are really shocking. Have you heard that hospitals are decreasing charges due to the outcry against them?

You have received payment from Medicare and Blue Cross of $1253.50 and from the patient of $355.50. He has also paid separately for the six shifts of private nursing.

Three years ago this patient, admitted to your hospital for the surgery performed this time, was placed in a semi-private room with a dying man. Because of the excitement surrounding this man day and night the patient suffered a heart attack, his first in his then 75 years. Instead of receiving the minor prostate correction he was scheduled for he was placed in intensive care for several days and then released. He suffered unnecessarily and the hospital profited from this useless stay.

This patient also develops lung congestion from too cold air-conditioning. For this reason when the prostate correction was scheduled again it was determined he would need a private room in order to survive the operation and the hospitalization.

The patient had a reservation at the hospital for three weeks prior to admittance:

1. Why was he admitted on Wednesday 3/15 at 1:00 P.M. to then wait until 8:00 the next morning before anything was done for him expending $80 for the privilege of walking the halls?

(Paragraphs 2 on group nursing charges, 3, and 4 on same, 5 on medication charges are deleted to eliminate length of this letter.)

Please supply me with the following:

1. Itemized list of special medical supplies - $45.00
2. Justification for charges of $96 for drugs given aside from intravenous and inhalation therapy.
3. Itemization of additional $44.50 added to original bill.
4. Charge of $49.50 for group care on 3/16 when patient was in testing and ambulatory all day.
5. Charge of $80 for admission one day before needed.

If there is justification then the patient will pay what is justified in addition to the $1608.50 you have already received for what is generally considered confinement for minor surgery.

Very truly yours,
s/s Edith Broida - Washington, D.C.